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FILED IN UNITED STATES DISTRICT COURT, DISTRICT OF UTAH

JUL 11 2014
BY D. MARK JONES, CLERK

DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, NORTHERN DIVISION

UNITED STATES OF AMERICA, : 2:14-MJ 218.DBP-PMW
: Plaintiff, : FELONY COMPLAINT
: vs. : VIO.
: JOHN HUGGINS, : 26 U.S.C. § 5861(d)
: Defendant. : Possession of an Unregistered
: : Destructive Device
: : Judge Paul M. Warner

Before the Honorable Paul M. Warner, Magistrate Judge for the District of Utah,
appeared the undersigned, who on oath deposes and says the following:

COUNT 1
26 U.S.C. § 5861(d)
Possession of an Unregistered Destructive Device

On or about July 10, 2014, in the Northern Division of the District of Utah,

JOHN HUGGINS,

defendant herein, did knowingly possess a firearm as defined in 26 U.S.C. § 5845(a)(8) and 26 U.S.C. § 5845(f), to wit: a "destructive device, which firearm was not registered to the defendant in the National Firearms Registration and Transfer Record; all in violation of 26 U.S.C. § 5861(d).

AFFIDAVIT

I, Steven Cadiz, being duly sworn, depose:

I am a Special Agent with the Federal Bureau of Investigation and am assigned to the Salt Lake City Division, Domestic Terrorism Squad. I have been employed by the Department of Justice as a federal investigator for over six years. I have received specialized training in the investigation of federal violations from the FBI Academy in Quantico, Virginia.

During my law enforcement career, I have conducted and assisted in multiple investigations related to federal and state criminal violations. I have participated in the execution of federal and state search warrants for several types of federal violation to include narcotics violations and have conducted interviews of suspects, witnesses, and informants relating to a variety of criminal offenses.

This affidavit does not contain all of the information known to me or to law enforcement regarding this investigation, but rather contains only those facts believed to be necessary to secure the issuance of a federal criminal complaint. I have personally participated in this investigation and the following information is derived from my personal observation, from a review of physical evidence, from my review of reports generated by other law enforcement officials and agencies and discussions with other investigators who have personal knowledge of the matters covered in those reports, and from conversations with persons who have personal knowledge of the events described herein. The statements contained in this affidavit are based in part on information provided to me by other officers, my own personal knowledge and investigation, and my training and experience as a Special Agent with the FBI.

On February 24th, 2014, the Tremonton Police Department was contacted by a concerned citizen who was aware that John Huggins ("Huggins") had indicated that he was going to blow up his bible group and that he had bombs buried in Ogden.

Subsequent follow-up with the citizen resulted in information that the threat was not against the bible study group, but that Huggins wanted to blow up the Tremonton Police Department. It was reported that Huggins also wanted to assassinate two officers prior to the bombing, and then blow up the police department. In addition to the police department, Huggins planned on blowing up bridges and other infrastructure to prevent assistance from responding to help. Huggins stated that he thought that this action would cause the community to rise up against the government. A Detective from the Tremonton Police Department ("Tremonton Detective") has informed me that in March of 2013, the Box Elder Strike Force conducted a search of Huggins' residence and among the items located were 5 spiral notebooks. Inside these notebooks were notes written by Huggins that were surveillance logs of the activities of Tremonton Police officers including their call signs. It is known that Huggins had manufactured explosive devices in the past that had to be detonated by the Cache County Bomb Squad.

The Federal Bureau of Investigation (FBI) was contacted on February 24th, 2014 to assist with the investigation of an active threat against a law enforcement agency and officers.

During the course of this investigation the Tremonton Detective developed a confidential informant ("CI"). This CI had a number of conversations with Huggins. On May 12, 2014 at 1000 hours, the CI purchased a USB thumb drive from Huggins that contained data that consisted of instructions on how to manufacture drugs, explosives, booby traps, and other

documents. This data also included videos of explosions. The informant witnessed the information transferred from the computer that was located in Huggins trailer to a USB thumb drive that came from a computer that was located in Huggins' trailer. This computer is the same computer that was seized in the parking lot at the time of Huggins' arrest, according to CI.

At the direction of your affiant, arrangements were made to introduce an undercover FBI agent (hereafter referred to as UCE) to Huggins. They discussed the manufacturing of bombs, and Huggins showed the UCE a video of himself blowing up a vehicle. Eventually Huggins offered to make a bomb for the UCE. The UCE agreed and another meeting was arranged.

On July 7, 2014, the Tremonton Detective was contacted by the CI who stated that Huggins had been manufacturing shrapnel to put inside explosives. The CI described the shrapnel as sharp metal. The CI also stated that he saw the shrapnel in a barrel in the trailer.

On July 8, 2014, the Tremonton Detective was contacted by again by the CI who advised that Huggins had manufactured an explosive device. The CI stated that on July 8, 2014 they were located in John Huggin's trailer, and that Huggins showed him this explosive device and that they were able to handle the explosive. The CI stated that Huggins is keeping the bomb in a cupboard up by the door. The CI described the device as a pipe bomb with blue glue on it. The CI further described this as a PVC glue can that had a 5 hour energy bottle with explosives on the inside and that it was surrounded by the shrapnel that Huggins has been manufacturing. The device is described as having a long fuse coming from it, with the device itself being approximately 4 inches long. On July 9, 2014, the Tremonton Detective notified the FBI about the device and a person-to-person meeting was set up between Huggins and the UCE. A meeting was then set up that occurred on July 10, 2014 at a restaurant located in Tremonton Utah. The informant and the UCE met with Huggins at this time and Huggins

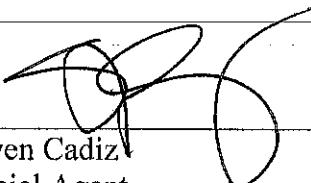
initiated a conversation about an explosive device that the informant had already seen. During this conversation, it was agreed that Huggins would produce an explosive device for the UCE to purchase. During this meeting, Huggins also sold a detailed notebook containing schematics, instructions and lists of items/chemicals necessary to manufacture more bombs, as well as flashdrives containing digital books on various subjects to include explosives manufacturing. During the UCE meet, Huggins told that UCE that an explosive device and components are still in the trailer. The CI also saw the device sitting on the table to the trailer just prior to leaving to meet with the UCE. Huggins agreed to show the UCE the explosive device. At this point Huggins was taken into custody.

Based on the information provided above, the Tremonton Detective acquired a state search warrant for Huggins' trailer. The search warrant resulted in police officers locating what appeared to be an IED and explosive materials. A bomb technician examined the IED and determined based off of preliminary observations that the item could be used much like a grenade.

During the custodial interview with FBI Agents, Huggins stated he had agreed to train/consult a group of individuals represented by the UCE on how to make high energy explosive devices for a few thousand dollars. Huggins also told investigators that a "training device" would be found in his trailer, and while an explosive chemical was not inside the device for detonation, there were chemicals inside the trailer that could easily be combined with the device to produce an IED. Based on contacts with the Bureau of Alcohol Tobacco and Firearms, ("ATF") it appears that Huggins has not registered this device in the National Firearms Registration and Transfer record.

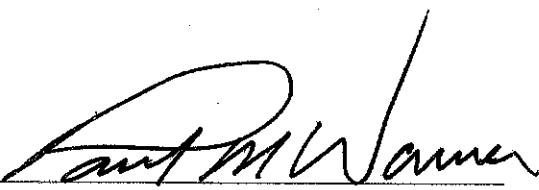
11. Based upon the foregoing, your affiant believes that there is probable cause to

believe John Huggins violated 26 U.S.C. § 5861(d) (Possession of an Unregistered Destructive Device).



Steven Cadiz
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before me this 11th day of July 2014



Paul M. Warner
U.S. Magistrate Judge, District of Utah